



IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE BOARD OF PATENT APPEALS

11/17/1999
1-22-00
C

Appellants:	Michael D. Stapf	REPLY BRIEF
Serial No.	09/291,535	
Filing Date	April 14, 1999	
Group Art Unit	2122	
Examiner	C. Das	
Attorney Docket No.	100.113US01 (formally 500.720US01)	
Title: Interface For An Enterprise Resource Planning Program		RECEIVED DEC 31 2003 Technology Center 2100

Remarks

In the Examiner's Answer, the Examiner responded to four arguments found in Applicant's Appeal Brief. Applicant provides the following comments to clarify the issues addressed by the Examiner. Each of these issues is addressed in turn below.

The Examiner argued:

(i) "Geller teaches providing the data into the ERP system." Examiner's Answer at p. 9, lines 9-15.

Response:

In this argument, the Examiner apparently gave no weight to the language of the claims that limit the scope of claimed invention to a particular technique for providing data into the ERP system. Specifically, the Applicant pointed the Examiner to the last limitation of independent claims 1, 13 and 20. It is in the context of these limitations that it is clear that Geller does not teach or suggest the claimed limitation. For example, the last limitation of claim 1 states:

processing each record in the data file according to the parameters in the parameter file to execute screens of the enterprise resource planning system so as to provide the data from the data file to the enterprise resource planning system. (Emphasis added).

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This point has been addressed by Applicant in prior communications. *See, e.g.*, Appeal Brief at p. 10, lines 16-19. However, the Examiner apparently has given this statement from Geller no weight in arguing that Geller teaches loading data into an ERP.


(iv) "Geller and Glowny teach all the limitations cited in the claims 11-12, 15, and 22. Examiner's Answer at p. 10, line 21 to p. 11, line 4.

Response:

Applicant respectfully asserts that there is no motivation to combine Glowny with Geller. First, as argued in the Applicant's Appeal Brief, Geller does not teach or suggest the elements of the independent claims (1, 13 and 20). Further, Geller does not teach or suggest loading data into an ERP system from a data file in a process that may be interrupted. Thus, absent Applicant's disclosure, there would be no reason (e.g., no suggestion or motivation) to modify Geller with the technique of Glowny for returning to a point in a process that was interrupted since Geller did not teach or suggest an interruptable process.

Respectfully submitted,

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David N. Fogg
Reg. No. 35,138

Attorneys for Applicant
Fogg and Associates, LLC
P.O. Box 581339
Minneapolis, MN 55458-1339
T 612 332-4720
F 612 677-3553

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During prosecution, the Examiner has not shown how Geller meets these limitations in the context of providing data to the ERP system. Further, the citations provided in the Examiner's Answer provide no additional insight on this and similar limitations in claims 13 and 20.

(ii) "Geller teaches parameter file for mapping data into ERP system." Examiner's Answer at p. 9, line 20 to p. 10, line 7.

Response:

The Examiner incorrectly ignores limitations of the claims with respect to the claimed parameters used to map data into the ERP system. Claim 1 specifically calls for:

wherein the parameter file *maps data from the data file to screens of the enterprise resource planning system*. (Emphasis added).

Applicant does not contend that Geller lacks the use of parameters. Applicant simply challenges the Examiner's assertion that the parameters of Geller teach or suggest mapping data to screens of an ERP system. The fact that parameters are associated with a product configurator does not mean that the parameters map data to the screens of the ERP system as claimed in claims 1 and 13. Further, the Examiner has failed to show how the parameters of Geller teach or suggest "creating commands based on the plurality of parameters" to provide data from a data file to the ERP system.

(iii) "Geller teaches loading the data into the ERP system." Examiner's Answer at p. 10, lines 12-16.

Response:

The Examiner's discussion of this point highlights the Examiner's failure to appreciate the context of the claimed invention. The claimed invention relates to loading data into the ERP. Geller on its face states that

[t]he ERP database 21 is maintained by a separate enterprise resource planning (ERP) application program 22, **which forms no part of the present invention**. The enterprise's ERP applications are responsible for keeping the ERP database 21 updated with current information such as product configuration data. Column 8, Lines 18-23. (*emphasis added*)



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Enclosures				Technology Center 2100	
The following documents are enclosed: <input checked="" type="checkbox"/> A Reply Brief (3 pgs.). <input checked="" type="checkbox"/> An itemized return receipt postcard.					
CUSTOMER NO. 34206					
Submitted By					
Name	David N. Fogg	Reg. No.	35,138	Telephone	612-332-4720
Signature				Date	December 23, 2003
Attorneys for Applicant Fogg & Associates, LCC P.O. Box 581339 Minneapolis, MN 55458-1339 T: 612-332-4720 F: 612-677-3553					
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I certify that this correspondence, and the documents identified above, are being deposited with the United States Postal Service as first class mail in an envelope addressed to: Mail Stop Appeal Brief-Patents, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on December 23, 2003					
Name	Lisa D. Gentry	Signature			